

Exhibit 4

BUTLER | SNOW

March 21, 2013

VIA E-MAIL

Bryan Aylstock, Esq.
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Pensacola, Florida 32591

RE: *In re: Ethicon, Inc. Pelvic Repair System, Products Liability Litigation,*
MDL No. 2327

Dear Bryan:

I am writing concerning our ongoing discussion over the scope of the production of ex-US documents. As we have previously discussed, we have agreed to collect and produce regulatory documents from France, Australia and, pursuant to your most recent request, Japan. As we have told you previously, ex-US regulatory documents are not stored in a central place. Instead, they are generally kept in the country of origin. Accordingly, just coordinating the identification and collection of documents from these three countries has taken a tremendous amount of work and time.

We are willing to work with you to identify other potential countries for the production of regulatory documents, but, at this point, we believe that documents from the countries you have requested provide you with what you need. We look forward to working toward a reasonable compromise on this. Of course, and a point not to be lost, you already have the US regulatory documents.

With respect to the marketing documents, we appreciate your agreement to narrow the countries to be collected to the EU countries (including Great Britain), South Africa, Australia, New Zealand and Japan. We are commencing this collection and will update you on a timetable for production. Given that we are having to deal with each of the 27 EU member countries (and the others that you request) individually, this is a large and time consuming task.

As for remaining documents, as you know, we have already produced to you all world-wide adverse events. Furthermore, we have produced, or will produce the design and manufacturing documents for the products at issue, no matter what country in which they may be located.

We agree that after the ex-US 30(b)(6) deposition, we should sit down to continue our

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discussions over what more should be produced, and the priority of those productions.

One last point that I would like to make is that we are not withholding documents simply because they may be located outside of the US. While we may disagree as to what is discoverable, we are not using the ex-US issue to shield documents. It is simply a matter of what we should be required to go collect and produce, particularly where this takes a country by country and issue by issue effort.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

/s/ William M. Gage

William M. Gage

WMG:fsw

cc:

Tom P. Cartmell (via e-mail)

Renee Baggett (via e-mail)